

Message

From: Grandinetti, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C73F8984588411FA3DF484D6386A013-GRANDINETTI, ROBERT]
Sent: 8/24/2018 8:50:17 PM
To: Skadowski, Suzanne [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1713ed42e6e244bc9fcd783d4a8d39ab-Skadowski, Suzanne]
CC: MacIntyre, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1ef0971b52b14f6a9df509c4800a10e3-Macintyre, Mark]
Subject: RE: Media query - Kitsap Sun: Naval Base Kitsap wastewater spill -- deadline Aug. 27

The other thing you could add (I just thought of this). The 12 quarters of violations that show in EPA's database did not show up in Washington's, so those are not violations and just data flow errors.

Rob Grandinetti
CWA Enforcement Specialist
EPA Region 10
Phone: 509-376-3748

From: Skadowski, Suzanne
Sent: Friday, August 24, 2018 1:44 PM
To: Grandinetti, Robert <Grandinetti.Robert@epa.gov>
Cc: MacIntyre, Mark <Macintyre.Mark@epa.gov>
Subject: RE: Media query - Kitsap Sun: Naval Base Kitsap wastewater spill -- deadline Aug. 27

Thank you very much Rob!

I'm going to go ahead and send our response to the reporter now (I'll send a copy to you both).

If she has any Qs next week, she can follow up with Mark. Otherwise Mark, you're off the hook on this one for now.

Suzanne Skadowski
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From: Grandinetti, Robert
Sent: Friday, August 24, 2018 1:22 PM
To: Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>
Cc: MacIntyre, Mark <Macintyre.Mark@epa.gov>
Subject: Media query - Kitsap Sun: Naval Base Kitsap wastewater spill -- deadline Aug. 27

Mark and Suzanne,
Here is what I have put together. Let me know if this looks good or not.
Thank you

- 1) Did any violations of environmental regulations occur with this spill? If so, would I be able to get a copy of the notice of violation?

EPA: An unauthorized (unpermitted) discharge of wastewater or other pollution into waters of the U.S., in this case Sinclair Inlet, could be a violation of the Clean Water Act. EPA is reviewing the Navy's reported blocked sewage line break. EPA does not comment on any pending or ongoing compliance or enforcement actions. EPA has not issued an NOV, as we are still gathering information.

- 2) Is there any sort of penalty for the delay in reporting the spill? Any penalty for potential violations?

EPA: The Navy's sewage line is part of the facility's sanitary/domestic wastewater collection system that goes to the Bremerton wastewater treatment plant authorized (permitted) by WA Department of Ecology. The facility's domestic wastewater collection system does not require an EPA permit. Since there is no EPA permit for the Navy's sewage line, the Navy is not required to report a spill from this system to EPA. There is no requirement to report spills under the CWA.

- 3) What is the impact of a spill of that size to the water? What's the risk to the public of potentially being exposed to contaminants in the water for the additional four days after the spill was discovered?

EPA: EPA is reviewing the Navy's reported blocked sewage line break and spill. When sanitary sewers malfunction, break or otherwise fail, they can release raw sewage. These types of releases can degrade water quality and expose humans to pathogens and viruses that can cause illness. The specific impacts to the environment or to public health from the Navy's reported blocked sewage line break and spill are unknown at this time.

- 4) I also wanted to follow up with you in regards to the Navy's wastewater/stormwater/general permits, like we spoke about earlier this week. When I checked the EPA's NPDES permits database online, it looks like PSNS' permit expired in 1999. Would you be able to send me a copy of whatever is their current permit?

EPA: The following link includes EPA's National Pollutant Discharge Elimination System (NPDES) final permit and supporting documents for the U.S. DOD Puget Sound Naval Shipyard Wastewater (Stormwater only) Treatment Plant discharging to Sinclair Inlet in Bremerton, Washington. Permit number: WA0002062 Effective date: April 1, 1994 Permit expires: April 1, 1999 (administratively extended) NPDES Permit for Puget Sound Naval Shipyard Wastewater Treatment Plant in Washington

This is an industrial stormwater permit, and the industrial water is separate from the domestic/sanitary wastewater. This permit does not apply to the Navy's reported blocked sewage line break. Also, above the treated steam plant wastewater is their boiler water (how they heat their facilities and generate electricity, essentially hot water). Under this permit the Navy is authorized to discharge drydock drainage and noncontact cooling water from outfalls 018 (including 018A and 096) and 019, treated steam plant wastewater from outfall 021, and stormwater runoff, demineralized water, steam condensate, salt water supply system, and potable water from the remaining outfalls.

The Navy's reported blocked sewage line is part of the Navy's sanitary sewage collection system that goes to the Bremerton wastewater treatment plant authorized (permitted) by WA Department of Ecology.

~~There are three EPA issued permits for wastewater treatment plants in that area. The blocked sewage was not en route to any of these plants:~~

- ~~● Naval Air Station — Whidbey Island Seaplane Base Wastewater Treatment plant (jurisdiction with Ecology until Dec. 27, 2018). EPA permit was just issued, effective 12/27/2018).~~
- ~~● Naval Air Station — Whidbey Island Ault Field (expired 2/28/2016)~~
- ~~● Naval Base Kitsap Bangor (expired 8/31/2015)~~

I would take this out as it confuses my explanation of number 5 below.

- 5) The shipyard's detailed facility report on the EPA's Enforcement and Compliance History Online portal, it looks like PSNS has been noncompliant with the Clean Water Act for all 12 of the last 12 quarters, with two "significant" violations. That seems like quite a while to be out of compliance. Is that accurate, or has their profile not been updated? What were those significant violations?

EPA: As it shows in EPA's Enforcement and Compliance History Online portal, there are three permits associated with this site. Permit numbers WAP007374, WA0002062, and WAL002062. Permit WA0002062 is the EPA industrial permit that EPA administers. Permit WAL002062 and WAP007374 are state permits and should be addressed with Ecology. However, the 12 quarters are associate with WAP007374, and is an issue that has come up state wide with regards to data flowing from the Washington's database to EPA's database (the portal you found the information). There have been numerous facilities in Washington that have violations in EPA's system because of data flow issues, EPA is currently working with Washington to fix this problem state wide.

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